

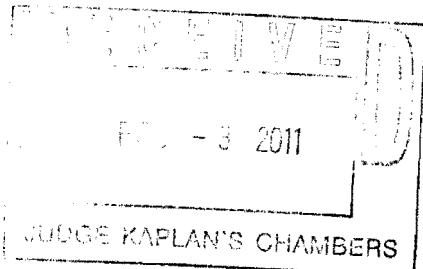
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHEVRON CORPORATION,

Plaintiff,

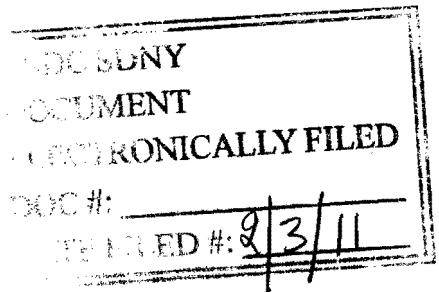
v.

STEVEN DONZIGER, THE LAW OFFICES OF  
STEVEN R. DONZIGER, PABLO FAJARDO  
MENDOZA, LUIS YANZA, FRENTE DE  
DEFENSA DE LA AMAZONIA A/K/A AMAZON  
DEFENSE FRONT, SELVA VIVA SELVIVA  
CIA, LTDA., STRATUS CONSULTING, INC.,  
DOUGLAS BELTMAN, ANN MAEST, MARIA  
AGUINDA SALAZAR, CARLOS GREFA  
HUATATOCA, CATALINA ANTONIA  
AGUINDA SALAZAR, LIDIA ALEXANDRA  
AGUINDA AGUINDA, PATRICIO ALBERTO  
CHIMBO YUMBO, CLIDE RAMIRO AGUINDA  
AGUINDA, LUIS ARMANDO CHIMBO  
YUMBO, BEATRIZ MERCEDES GREFA  
TANGUILA, LUCIO ENRIQUE GREFA  
TANGUILA, PATRICIO WILSON AGUINDA  
AGUINDA, CELIA IRENE VIVEROS  
CUSANGUA, FRANCISCO MATIAS  
ALVARADO YUMBO, FRANCISCO  
ALVARADO YUMBO, OLGA GLORIA GREFA  
CERDA, LORENZO JOSÉ ALVARADO  
YUMBO, NARCISA AIDA TANGUILA  
NARVÁEZ, BERTHA ANTONIA YUMBO  
TANGUILA, GLORIA LUCRECIA TANGUILA  
GREFA, FRANCISCO VICTOR TANGUILA  
GREFA, ROSA TERESA CHIMBO TANGUILA,  
JOSÉ GABRIEL REVELO LLORE, MARÍA  
CLELIA REASCOS REVELO, MARÍA  
MAGDALENA RODRÍGUEZ BARCENAS,  
HUGO GERARDO CAMACHO NARANJO, JOSÉ  
MIGUEL IPIALES CHICAIZA, HELEODORO  
PATARON GUARACA, LUISA DELIA  
TANGUILA NARVÁEZ, LOURDES BEATRIZ  
CHIMBO TANGUILA, MARÍA HORTENCIA  
VIVEROS CUSANGUA, SEGUNDO ÁNGEL



Case No. 11-CV-0691

[PROPOSED] ORDER TO  
SHOW CAUSE WHY A  
TEMPORARY RESTRAINING  
ORDER AND PRELIMINARY  
INJUNCTION SHOULD NOT  
BE ENTERED



AMANTA MILÁN, OCTAVIO ISMAEL :  
CÓRDOVA HUANCA, ELIAS ROBERTO :  
PIYAHUAJE PAYAHUAJE, JAVIER PIAGUAJE :  
PAYAGUAJE, DANIEL CARLOS LUSITANDE :  
YAIGUAJE, BENANCIO FREDY CHIMBO :  
GREFA, GUILLERMO VICENTE PAYAGUAJE :  
LUSITANTE, DELFÍN LEONIDAS PAYAGUAJE :  
PAYAGUAJE, ALFREDO DONALDO :  
PAYAGUAJE PAYAGUAJE, TEODORO :  
GONZALO PIAGUAJE PAYAGUAJE, MIGUEL :  
MARIO PAYAGUAJE PAYAGUAJE, FERMIN :  
PIAGUAJE PAYAGUAJE, REINALDO :  
LUSITANDE YAIGUAJE, LUIS AGUSTÍN :  
PAYAGUAJE PIAGUAJE, EMILIO MARTÍN :  
LUSITANDE YAIGUAJE, SIMON LUSITANDE :  
YAIGUAJE, ARMANDO WILFRIDO PIAGUAJE :  
PAYAGUAJE, and ÁNGEL JUSTINO :  
PIAGUAGE LUCITANTE, :  
Defendants. :  
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Upon sufficient cause appearing from Chevron Corporation's Complaint in this matter, dated February 1, 2011; the Declaration of Kristen L. Hendricks and supporting exhibits, dated February 3, 2011; the Declaration of Vladimiro Álvarez Grau and supporting exhibits, dated February 1, 2011; and the Memorandum of Law in Support of Chevron's Application by Order to Show Cause for a Temporary Restraining Order and Preliminary Injunction, dated February 3, 2011, it is hereby

ORDERED that defendants Steven Donziger, the Law Offices of Steven R. Donziger, Pablo Fajardo Mendoza, Luis Yanza, Frente de Defensa de la Amazonia a/k/a Amazon Defense Front, Selva Viva Selviva CIA, Ltda., Stratus Consulting, Inc., Douglas Beltman, Ann Maest, María Aguinda Salazar, Carlos Grefa Huatatoca, Catalina Antonia Aguinda Salazar, Lidia Alexandra Aguinda Aguinda, Patricio Alberto Chimbo Yumbo, Clide Ramiro Aguinda Aguinda,

Luis Armando Chimbo Yumbo, Beatriz Mercedes Grefa Tanguila, Lucio Enrique Grefa Tanguila, Patricio Wilson Aguinda Aguinda, Celia Irene Viveros Cusangua, Francisco Matias Alvarado Yumbo, Francisco Alvarado Yumbo, Olga Gloria Grefa Cerda, Lorenzo José Alvarado Yumbo, Narcisa Aida Tanguila Narváez, Bertha Antonia Yumbo Tanguila, Gloria Lucrecia Tanguila Grefa, Francisco Victor Tanguilla Grefa, Rosa Teresa Chimbo Tanguila, José Gabriel Revelo Llore, María Clelia Reascos Revelo, María Magdalena Rodríguez Barcenes, Hugo Gerardo Camacho Naranjo, José Miguel Ipiales Chicaiza, Heleodoro Pataron Guaraca, Luisa Delia Tanguila Narváez, Lourdes Beatriz Chimbo Tanguila, María Hortencia Viveros Cusangua, Segundo Ángel Amanta Milán, Octavio Ismael Córdova Huanca, Elias Roberto Piyahuaje Payahuaje, Javier Piaguaje Payaguaje, Daniel Carlos Lusitande Yaiguaje, Benancio Fredy Chimbo Grefa, Guillermo Vicente Payaguaje Lusitante, Delfín Leonidas Payaguaje Payaguaje, Alfredo Donaldo Payaguaje Payaguaje, Teodoro Gonzalo Piaguaje Payaguaje, Miguel Mario Payaguaje Payaguaje, Fermin Piaguaje Payaguaje, Reinaldo Lusitande Yaiguaje, Luis Agustín Payaguaje Piaguaje, Emilio Martín Lusitande Yaiguaje, Simon Lusitande Yaiguaje, Armando Wilfrido Piaguaje Payaguaje, and Ángel Justino Piaguage Lucitante (collectively, "Defendants"), and their officers, agents, servants, employees and attorneys, and all persons in active concert or participation with them, show cause before this Court, at Room 2D, United States Courthouse, 500 Pearl Street, in the City, County and State of New York, on February 8, 2011, at 2:00 p.m. EST, why an order should not be issued, pursuant to Rule 65(b) of the Federal Rules of Civil Procedure, temporarily enjoining and restraining, until after the Court has had an opportunity to ~~hold a hearing and~~ rule on Chevron's application for a preliminary injunction, and then preliminarily enjoining, Defendants and any persons acting in concert with them from funding, commencing, prosecuting, advancing in any way, or receiving benefit from, directly or

indirectly, any action or proceeding for recognition or enforcement of any judgment entered against Chevron in *Maria Aguinda y Otros v. Chevron Corporation*, No. 002-2003 ("Lago Agrio Litigation") currently pending in the Provincial Court of Justice of Sucumbíos in Ecuador, or for prejudgment seizure or attachment of assets based on any such judgment; and it is further

ORDERED that Chevron is granted permission to file an oversized brief of up to 70 pages in support of its Application by Order to Show Cause for a Temporary Restraining Order and Defendants may file one or more briefs collectively and Preliminary Injunction; and it is further totalling up to 70 pages

✓ ORDERED that service of a copy of this Order to Show Cause and all of the papers submitted in support thereof, and of the Summons and Complaint, by hand, facsimile, email or overnight mail upon the Defendants or their counsel, including all foreign Defendants named in the Complaint in this matter, or their counsel, on or before 1:00 p.m. EST on February 4, 2011, shall be deemed good and sufficient service thereof; and it is further

ORDERED that, pursuant to Federal Rule of Civil Procedure 4(f), for purposes of effecting service on defendants Luis Yanza ("Yanza") and Pablo Fajardo ("Fajardo") as called for by this Order, it shall be deemed good and sufficient service on Yanza and Fajardo to serve this Order, the papers submitted in support thereof, and the Summons and Complaint by e-mail; and it is further

ORDERED that, pursuant to Federal Rule of Civil Procedure 4(f), for purposes of effecting service on the 47 individual defendants also known as the "Lago Agrio Plaintiffs"<sup>1</sup>, as

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<sup>1</sup> The 47 Lago Agrio Plaintiff defendants are: Maria Aguinda Salazar, Carlos Grefa Huatatoca, Catalina Antonia Aguinda Salazar, Lidia Alexandra Aguinda Aguinda, Patricio Alberto Chimbo Yumbo, Clide Ramiro Aguinda Aguinda, Luis Armando Chimbo Yumbo,

[Footnote continued on next page]

called for by this Order, it shall be deemed good and sufficient service on the 47 Lago Agrio Plaintiff defendants to serve this Order, the papers submitted in support thereof, and the Summons and Complaint, by email on Defendant Pablo Fajardo, who it has been represented to this Court possesses a power of attorney on behalf of those 47 individuals<sup>2</sup>; and it is further

ORDERED that, pursuant to Federal Rule of Civil Procedure 4(f), for purposes of effecting service on defendants Frente de Defensa de la Amazonia a/k/a Amazon Defense Front (“FDA”) and Selva Viva Selviva Cia, Ltda. (“Selva Viva”), as called for by this Order, it shall be deemed good and sufficient service on FDA and Selva Viva to serve this Order, the papers submitted in support thereof, and the Summons and Complaint by e-mail and/or mail; and it is further

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[Footnote continued from previous page]

Beatriz Mercedes Grefa Tanguila, Lucio Enrique Grefa Tanguila, Patricio Wilson Aguinda Aguinda, Celia Irene Viveros Cusangua, Francisco Matias Alvarado Yumbo, Francisco Alvarado Yumbo, Olga Gloria Grefa Cerdá, Lorenzo José Alvarado Yumbo, Narcisa Aida Tanguila Narváez, Bertha Antonia Yumbo Tanguila, Gloria Lucrecia Tanguila Grefa, Francisco Victor Tanguilla Grefa, Rosa Teresa Chimbo Tanguila, José Gabriel Revelo Llore, María Clelia Reascos Revelo, María Magdalena Rodríguez Barcenes, Hugo Gerardo Camacho Naranjo, José Miguel Ipiales Chicaiza, Heleodoro Pataron Guaraca, Luisa Delia Tanguila Narváez, Lourdes Beatriz Chimbo Tanguila, María Hortencia Viveros Cusangua, Segundo Ángel Amanta Milán, Octavio Ismael Córdova Huanca, Elias Roberto Piyahuaje Payahuaje, Javier Piaguaje Payahuaje, Daniel Carlos Lusitande Yaiguaje, Benancio Fredy Chimbo Grefa, Guillermo Vicente Payaguaje Lusitante, Delfín Leonidas Payaguaje Payaguaje, Alfredo Donaldo Payaguaje Payaguaje, Teodoro Gonzalo Piaguaje Payaguaje, Miguel Mario Payaguaje Payaguaje, Fermín Piaguaje Payaguaje, Reinaldo Lusitande Yaiguaje, Luis Agustín Payaguaje Piaguaje, Emilio Martín Lusitande Yaiguaje, Simon Lusitande Yaiguaje, Armando Wilfrido Piaguaje Payaguaje, and Ángel Justino Piaguaje Lucitante.

<sup>2</sup> See *In re Application of Chevron*, No. 10 MC 00002, Dkt. 165-1, 165-2 (LAK)

ORDERED that papers in opposition to Chevron's motion for a preliminary injunction, if any, shall be served by hand, facsimile, email, or overnight mail upon Chevron's counsel ~~on or~~ <sup>by such time as the Court may fix by subsequent order</sup> before ~~10:00~~ <sup>10:00</sup> m. EST on ~~February~~ <sup>February</sup>, 2011; and it is further

✓ ORDERED that reply papers in further support of Chevron's motion for a preliminary injunction, if any, shall be served by hand, facsimile, email, or overnight mail upon the Defendants or their counsel ~~on or before~~ <sup>by such time as the Court may fix by subsequent order</sup> ~~10:00~~ <sup>10:00</sup> m. EST on ~~February~~ <sup>February</sup>, 2011; and it is further

✓ ORDERED that the Defendants and their officers, agents, servants, employees and attorneys, and all persons in active concert or participation with them, show cause before this Court, at Room 12D, United States Courthouse, 500 Pearl Street, in the City, County and State of New York, ~~on February~~ <sup>by such time as the Court may fix by subsequent order</sup>, 2011, at ~~10:00~~ <sup>10:00</sup> m. EST, why an order should not be issued, pursuant to Rule 65(a) of the Federal Rules of Civil Procedure, preliminarily enjoining Defendants and any persons acting in concert with them from funding, commencing, prosecuting, advancing in any way, or receiving benefit from, directly or indirectly, any action or proceeding for recognition or enforcement of any judgment entered against Chevron in *Maria Aguinda y Otros v. Chevron Corporation*, No. 002-2003 ("Lago Agrio Litigation") currently pending in the Provincial Court of Justice of Sucumbíos in Ecuador, or for prejudgment seizure or attachment of assets based on any such judgment.

Dated: February 3, 2011  
New York, New York

SO ORDERED

U.S.D.J.

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